

ASHLAND DISTRIBUTION COMPANY SUBMITS HAZARDOUS WASTE MANAGEMENT PERMIT RENEWAL APPLICATION

The Tennessee Department of Environment and Conservation (TDEC) Division of Solid Waste Management (DSWM) received Part A and Part B hazardous waste management permit applications from Ashland Distribution Company (Ashland) for renewal of their corrective action permit. This facility (EPA ID Number TND048319644) is located in Shelby County at 2351 Channel Avenue, Memphis, TN 38106. Nexeo Solutions, LLC purchased the property and the chemical distribution business from Ashland in 2011, but Ashland retained all responsibilities for implementing the approved final remedy at the facility.

The current permit, TNHW-135, is only for corrective action of solid waste management units (SWMUs) and areas of concern (AOCs). There are no post-closure units at the site. Prior to issuance of TNHW-135, all releases to the environment had been thoroughly investigated and all active remedial actions were completed. The site-wide final remedy, which was approved with the issuance of that permit, requires Ashland to perform compliance monitoring and to maintain institutional controls at the facility. Unless a previously unidentified historical release is discovered, no other investigation or active remedial action by Ashland is required. Since the permit was issued, all contaminant concentrations in the site's monitoring wells have been orders of magnitude below the established groundwater clean-up standards.

TNHW-135 was issued on March 5, 2008 and was effective for ten years. Because the facility submitted their Part B renewal application at least 180 days before the current permit was set to expire, Tennessee Hazardous Waste Management Regulations allow the facility to continue to operate under the current permit until another permit is issued or denied. If renewed, the permit will allow the facility to continue compliance monitoring and maintenance of institutional controls.

A public notice was published on September 26, 2017 advising that Ashland would hold a pre-application public meeting on October 26, 2017. The purpose of the meeting was to provide information, answer questions and receive comments concerning the renewal of TNHW-135. The public notice and the applications incorrectly identified the site as requiring renewal of a post-closure permit rather than a corrective action permit. To address these deficiencies, Ashland submitted a revised Part B on November 16, 2017 and a new Part A, including permit application fees, on March 29, 2018.

As set forth in the Regulations, a complete permit application, consisting of a Part A and a Part B, must include certain text, drawings and other information adequate to demonstrate that the facility will comply with the various technical and administrative standards applicable to such a facility. Evaluation of the application involves an in-depth review of the application materials by DSWM staff and subsequent correspondence between DSWM and the facility identifying and correcting any deficiencies in the submitted information. Once it determines the application is complete, DSWM will make a tentative decision to either grant or deny the permit and issue either a draft permit or a notice of intent to deny the permit. Public Notice will be given of this tentative decision, and the public will have at least 45 days to submit written comments on the draft permit/proposed action. A public hearing will also be held to receive public comments within this public comment period. After considering the public comments received and making any appropriate revisions, the DSWM Director will issue a final permit decision to either issue or deny the permit. A [Response to Comments](#) will also be issued at that time.

Comments and questions about the renewal and Nexeo and Ashland's operations at the site were submitted to the DSWM on December 28, 2017. Clayton Bullington, DSWM Hazardous Waste Permitting, sent a response to address those questions on January 30, 2018. An electronic copy of that response, Ashland's revised applications and other facility information are available online at

tn.gov/environment/notices/ashland and at the DSWM Central Office on the 14th Floor of the Tennessee Tower, 312 Rosa L. Parks Avenue, Nashville, TN 37243 (615-532-0780). Paper copies are available for public inspection at the South Branch Library, 1929 South Third Street, Memphis, TN (901-415-2780) and at the TDEC Memphis Environmental Field Office 8383 Wolf Lake Drive, Bartlett, TN 38133 (901-371-3000) during normal business hours, 8:00 a.m. to 4:30 p.m., Monday through Friday, except legal holidays.

Information, opinions, and inquiries may be directed to the DSWM's Central Office, TN Tower, 312 Rosa L. Parks Ave, 14th Floor, Nashville, TN 37243 attention Clayton Bullington at clayton.bullington@tn.gov (615-532-0859) throughout the permit review process.

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EEO/AA/ADAAA inquiries or complaints may be directed to the ADAAA Coordinator, TDEC HR Division, at (1 615 532-0200). Hearing impaired callers may use the Tennessee Relay Service (1 800 848-0298).

If it is hard for you to read, speak, or understand English, TDEC may be able to provide translation or interpretation services free of charge. Please contact Mary F. Evans at 615-532-0798 for more information.

If you would like to receive notices like this directly, contact the Public Participation Officer in DSWM's Central Office for a Mailing List Request form. Email Solid.Waste@tn.gov or call 615-532-0788.

NOTICE ISSUED: June 13, 2018

